

FMC Corporation

Transmitted Via Federal Express

January 30, 2015

Jonathan Williams
Project Coordinator
U. S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Re: FMC Corporation Pocatello, ID
Unilateral Administrative Order for Remedial Design and Remedial Action
EPA Docket No. CERCLA 10-2013-0116
Groundwater Remedy - Preliminary (30%) Engineering Design Submittal

Dear Mr. Williams,

The purpose of this letter is to transmit the Groundwater Remedy - Preliminary (30%) Engineering Design deliverables to EPA for review and comment. This submittal has been prepared for purposes of the interim remedial design and remedial action (RD/RA) FMC is conducting at the FMC OU as directed under the Unilateral Administrative Order (UAO) that the U.S. Environmental Protection Agency (EPA) issued to FMC effective June 20, 2013.

FMC received EPA comments on the Hydrogeologic Study Report (HSR) on December 4, 2014. During its initial review, FMC noted that many of those comments were relevant to the groundwater remedial design. During our telephone conversation on December 9, 2014, FMC requested and EPA approved an extension for submittal of the response to comments and revised HSR until January 9, 2015. As agreed, FMC submitted the response to comments and revised HSR on that date. To formulate its responses to EPA comments relevant to the groundwater remedial design and address those in the Groundwater Preliminary Remedial Design Report and Supporting Documents, FMC requested and EPA approved during our telephone conversation on December 11, 2014 an extension to January 30, 2015 for submittal of the Groundwater Remedy - Preliminary (30%) Engineering Design. FMC is meeting that commitment with the enclosed submittal.

Enclosed for EPA review and comment are three sets of the following documents (and a DVD with electronic copies):

Volume 1 - Groundwater Remedy Preliminary (30%) Engineering Design and supporting documentation

- Preliminary Remedial Design Report
- Remedial Design Drawings¹
- Groundwater Treatability Study Report
- Remedial Design Calculations
- Remedial Construction Specifications
- Construction Quality Assurance Plan



Volume 2 – Supporting Documents (“Other Named Plans”)

- Emergency Response Plan (DVD only²)
- Transportation and Off-site Disposal Plan (DVD only²)
- Preliminary Draft Groundwater Remedy Performance Standards Verification Plan
- Preliminary Draft Groundwater Remedy Operations, Monitoring and Maintenance Plan

¹ Drawings (11” x 17”) are bound separately; EPA is also provided with one set of drawings produced as ANSI D size.

² As noted in FMC’s January 21, 2015 transmittal of the Soil Remedy Pre-Final Soil Remedial Action Engineering Design and Draft Remedial Action Work Plan, the Emergency Response Plan (ERP) and Transportation Off-Site Disposal Plan (TODP) were revised to incorporate the groundwater remedial action construction activities so that there is a unified ERP and TODP for both the soil and groundwater remedial actions. In order to conserve resources, second hard-copies of the ERP and TODP (both revised January 2015) are not included in the hard-copy of Volume 2 of this submittal. However, both are included on the DVD.

The preliminary schedule included in the Remedial Design Report is repeated below. Actual milestone dates are shown in **bold** font.

RD Deliverable / Work Element	Date
Submit Groundwater Remedy – Preliminary (30%) RD Package	January 30, 2015
EPA Comments on 30% Groundwater RD Package	April 3, 2015
Submit Groundwater Remedy – Intermediate (60%) RD Package, if determined to be necessary ¹	May 29, 2015
EPA Comments on 60% Groundwater RD Package, if determined to be necessary ¹	July 30, 2015
Submit Groundwater Remedy – Pre-Final (90%/95%) RD Package Submit Draft Groundwater Remedial Action Work Plan (Concurrent with Pre-Final RD Package)	September 25, 2015
EPA Comments on 90%/95% Groundwater RD Package EPA Comments on Draft Groundwater Remedial Action Work Plan	November 24, 2015
Submit Groundwater Remedy – Final (100%) Design Package Submit Final Groundwater Remedial Action Work Plan (Concurrent with 100% RD Package)	December 15, 2015
EPA Approval of Groundwater Remedy Final RD and RAWP	January 18, 2016
Pre-Construction Inspection and Meeting	February 17, 2016
Start of Construction	March 2, 2016
Completion of Construction (approx. 10 months)	January 7, 2017

¹ Pursuant to UAO Paragraph 30.f., if FMC determines during RD planning that a 60% Intermediate RD is necessary, FMC will submit the Intermediate (60%) RD for EPA comment. The Intermediate RD will: 1) be a

Mr. Jonathan Williams

January 30, 2015

Page 3

continuation and expansion of the preliminary design, 2) address all of EPA's comments regarding the Preliminary RD, and 3) include the same elements as are required for the Preliminary RD.

As stated in FMC's response to EPA specific comment 13 on the HSR, FMC agrees that one or more joint EPA, FMC and Simplot meetings may be valuable as the remedial design progresses from the preliminary to final design. We believe that this should begin with an initial meeting between EPA and FMC, focused on the groundwater remedial design and taking place after FMC receives EPA's comments on this Preliminary (30%) Engineering Design Submittal and we have had a reasonable amount of time to formulate preliminary responses to those comments. A later meeting between EPA and both FMC and Simplot representatives could then be scheduled.

If you have any questions, or require additional information, please contact me at 215/299-6210.

Sincerely,

A handwritten signature in cursive script that reads "Marguerite Carpenter".

Marguerite Carpenter, PhD
Associate Director, Environment

Enclosure

cc (as required under the UAO and directed by EPA):
Doug Tanner, Idaho Department of Environmental Quality (1 copy)
Scott Miller, Idaho Department of Environmental Quality (1 copy)
Kelly Wright, Shoshone-Bannock Tribes (1 copy)
Susan Hanson, Shoshone-Bannock Tribes (1 copy)